

EXHIBIT A

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Attorneys for Defendants
 UBER TECHNOLOGIES, INC.;
 RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF SCOTT BINNINGS
 IN SUPPORT OF DEFENDANTS'
 MARCH 21, 2025 BRIEF PURSUANT TO
 SPECIAL MASTER ORDER NO. 2 § III(6)**

This Document Relates to:

 ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
 Courtroom: G – 15th Floor

DECLARATION OF SCOTT BINNINGS

I, Scott Binnings, having personal knowledge of the following state:

1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first employed by Uber in April 2015 and have worked as in-house legal counsel for the past 9 years. My previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director, Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's March 21, 2025 brief pursuant to Special Master Order No. 2, § III(6) (ECF 2357). The facts set forth herein are true and correct and are based on my own personal knowledge, and I could and would competently testify thereto if called.

2. I am familiar with the document referenced by privilege log number as JCCP_MDL_PRIVLOG069773. It is a draft confidential and privileged document analyzing trends and a plan for a consideration of ratings across various types of Uber products. As part of my role as in-house counsel for Uber, I provide the company legal advice concerning safety tools and overall safety in operations, including providing legal advice on improving the process and application of safety tools. This document which is marked attorney-client privileged was authored by Holley Beasley, then-Senior Operations Manager, Premium Products, U.S. & Canada, for the primary purpose of requesting and documenting legal advice about this process. I, along with two other Uber attorneys, provided Ms. Beasley advice and counsel concerning the impact of these assessments and efforts, which are documented in detail at the end of the document. This document contains legal advice from me and other in-house attorneys, including Jenn Zhao. The draft and the comments on the draft both disclose legal advice and request further legal advice, and the document was created with the primary purpose of documenting an operational proposal and seeking and relaying legal advice to the relevant Uber stakeholders.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Anselmo, California on March 21, 2025. By: _____



Scott Binnings